Clinger-Cohen Act (CCA) Compliance Certification of Major Automated Information Systems for Fiscal Year (FY)04 and 05

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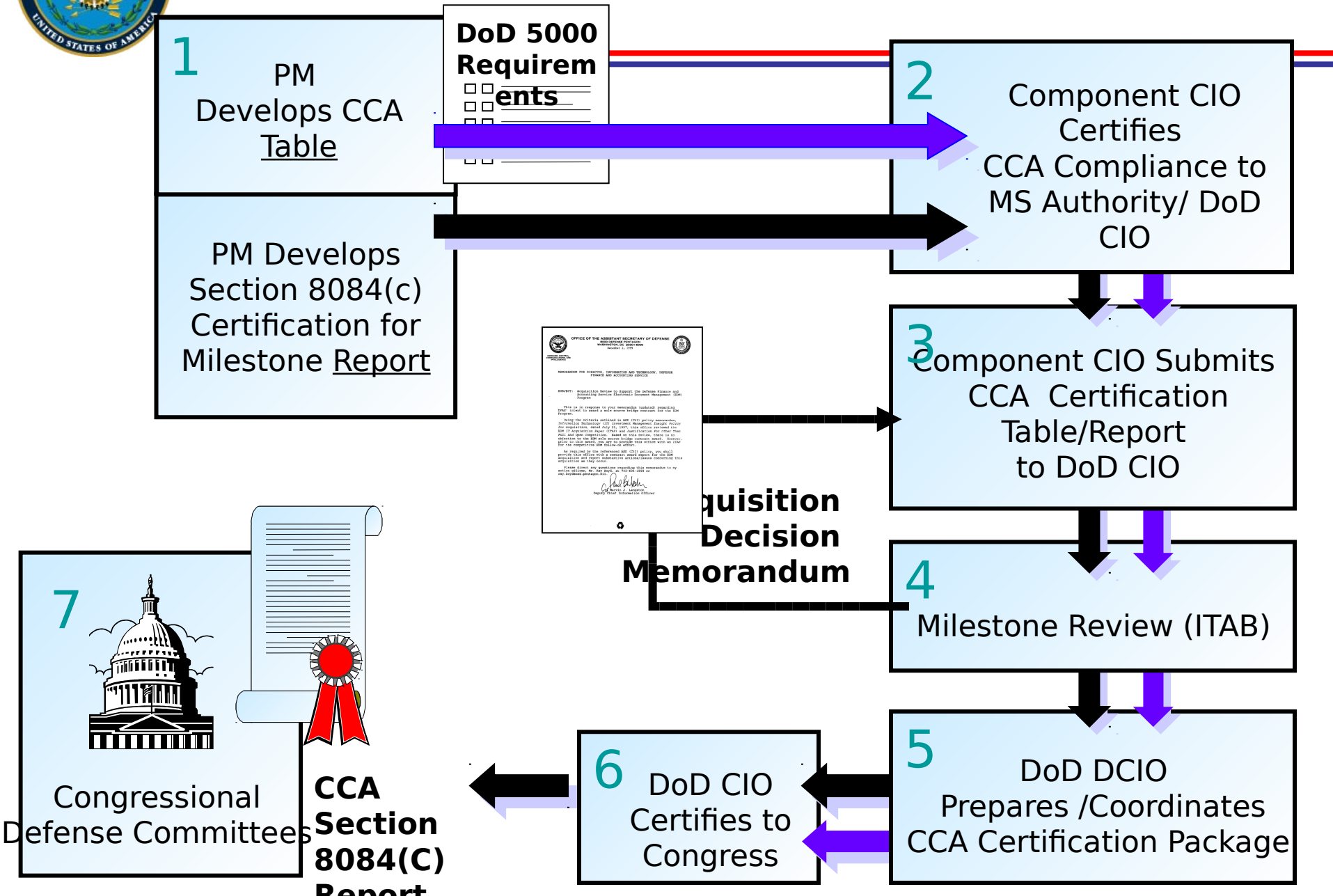**(703)602-0985 ext 105**

Agenda

- **Section 8084(c) National Defense Appropriations Act (Department of Defense Appropriation Act)**
  - **MAIS CCA Certification Process**
  - **What Happened**
  - **FY03 CCA Reports to Congress**
  - **CCA Certification Strategies**
  - **BPR, AoA, EA, Performance Measures,and IA Strategy DOs and DON'Ts**

- **The Non-Compliant**
- **CCA Certification of MAIS Program In FY05**
  - **Section 8080(c)**

Section 8084(c):

(1) A MAIS may not receive MS A, B, or full rate production approval, or their equivalent, until the DoD CIO certifies, with respect to that milestone, that the system is being developed IAW the CCA of 1996.

(2) The DoD CIO shall provide the Congressional Defense Committees timely notification of certifications under paragraph (1). Each such notification shall include, at a minimum, the funding baseline and milestone schedule for each system covered by such a certification and confirmation that the following steps have been taken with respect to the system:

a) Business process reengineering

b) An analysis of alternatives

c) An economic analysis that includes a calculation of the ROI

d) Performance measures

e) An information assurance strategy consistent with the

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MAIS CCA Certification Process

1 PM Develops CCA Table

PM Develops Section 8084(c) Certification for Milestone Report

DoD 5000 Requirements

2 Component CIO Certifies CCA Compliance to MS Authority/ DoD CIO

3 Component CIO Submits CCA Certification Table/Report to DoD CIO

Acquisition Decision Memorandum

4 Milestone Review (ITAB)

5 DoD DCIO Prepares /Coordinates CCA Certification Package

6 DoD CIO Certifies to Congress

7 Congressional Defense Committees

CCA Section 8084(C) Report

What Happened and What Did We Do In FY03

- **FY03 - - Congress reenacted the previous requirement that the DoD CIO to certify CCA compliance to the Congressional Defense Committees.**
- **CCA Compliance was still required for all Information Technology systems, including those in weapons and weapon system programs.**
- **In response: no official memo was issued.**
- **A Clinger-Cohen Act Integrated Product Team was established for implementation of Section 8088(c), Certifications as to Compliance with CCA, FY03 National Defense Appropriations Act.**
- **Guidelines issued for reporting to the Congressional Defense**
  Committees.

FY03 CCA Reports to Congress Under Section 8088(c)

- **Congressional Defense Committees Received 11 MAIS CCA Certification Reports:**
  - **Composite Health Care System II (CHCS II) – Heath Affairs**
  - **Defense Integrated Military Human Resources System (DIMRS) - Navy**
  - **Fuels Automated System (FAS) - DLA**
  - **Global Combat Support System/Joint Task Force (GCSS/JTF) - DISA**
  - **Global Information Grid – Bandwidth Expansion (GIG-BE) - DISA**
  - **Joint Computer-Aided Acquisition and Logistics Support (JCALS) – Army**
  - **Navy Enterprise Maintenance Automated Information System (NEMAIS) - NAVY**
  - **Reserve Component Automation System (RCAS) - Army**
  - **Teleport (TELEPORT) - DISA**
  - **Theater Medical Information Program (TMIP) – Heath Affairs**
  - **Transportation Coordinators Automatic Information for Movements System II (TC-AIMS II) - Army**

CCA Certification Strategies

<u>DOs</u>
- **PMO make early contact with Component CIO and functional stakeholders.**
- **Identify your program in subject line of all CCA correspondences, especially emails.**

<u>DON'Ts</u>
- **Don't use acronyms, abbreviations not spelled out or terms not previously explained.**
- **Don't make references to unattached or not provided documents.**
- **Don't assert CCA compliance without adequate support documentation.**

Business Process Reengineering (BPR) DOs

- **Prepare a summary of things done to achieve dramatic improvements in critical performance measures, i.e., cost, quality, service, and speed.**
- **Reflect rethinking of what the organization should be doing and how best to do it.**
- **Focus on the organization's business processes.**
- **State whether the process has been implemented.**
- **Show that gaps have been assessed between current performance and functional proponent/user needs.**
- **Program mission being aligned with strategic goals.**
- **Identify cost savings when ever possible.**
- **Identify the governance process through which program executive leadership manages change.**
- **Restate the mission outcomes, measures, and rationale**

Business Process Reengineering (BPR) DON'Ts

- **Don't use in document the term "To Be Determined".**
- **Don't use embedded pictures or embedded documents within your document.**
- **Don't make references to unattached or not provided documents.**
- **Don't provide unnecessary information that may lead to unanswered questions or follow-on inquiries by Congress.**
  - **An example would be your BPR results models.**
- **Don't use acronyms, abbreviations not spelled out or terms not previously explained.**

Analysis of Alternatives (AoA) DOs

- **Identify and discuss alternatives analyzed to justify the preferred alternative to be initiated to satisfy a valid mission need.**

- **Identify proposed Information Technology investments that support the core mission and functions that need to be performed by the Government.**

- **Identify how investment supports work processes that have been simplified or otherwise redesigned to reduce cost, improve effectiveness, and make maximum use of COTS technology.**

- **Identify affordability analysis that the preferred alternative is consistent with cost section of APB and 300b budget exhibit.**

- **Identify through clear analysis the alternative selected.**

- **Identify acceptable methodology and calculations.**

- **Identify investments undertaken by DoD because no alternative private sector or governmental sources can better support the function.**

Analysis of Alternatives (AoA)
DON'Ts

- **Don't exclude elements that should be considered in ROI:**
  - **improvements to mission performance.**
  - **resource savings, or qualitative mission benefits.**
  - **If possible provide an overall ROI for each increment of an incremental or evolutionary acquisition program.**
- **Don't automatically exclude privatization of functions.**
- **Don't make references to unattached or not provided documents.**
- **Don't provide unnecessary information that may lead to unanswered questions or follow-on inquiries by Congress.**
- **Don't use overly formulaic AoAs with one clearly indefensible option (usually terminate), one easily identifiable & desired option, and one "blue –sky" stretch end state.**

Economic Analysis (EA)
DOs

- **Identify information that indicates an improvement to mission performance.**
- **Identify resource savings, or qualitative mission benefits .**
- **Identify an overall Return on Investment (ROI) for each incremental or evolutionary acquisition program .**
- **Identify quantifiable numbers and measures.**
- **Provide a document that is consistent with the Measure of Effectiveness (MOE).**
- **Ensure the ROI is broad enough to capture all organizations, activities, etc. benefiting from the investment.**

Economic Analysis (EA)
DON'Ts

- **Don't make references to unattached or not provided documents.**
- **Don't provide unnecessary information that may lead to unanswered questions or follow-on inquiries by Congress.**
- **Don't use acronyms, abbreviations not spelled out or terms not previously explained.**
- **Don't fail to establish solid ROI based on anticipated benefits (tangible and intangible) which the program is to deliver.**

Performance Measures
DOs

- **Ensure there are clearly established mission performance measures and accountability for program progress for post deployment and evaluation.**

- **Ensure the performance measures are linked to DoD strategic goals and objectives.**

- **Ensure acquisition performance measures are being used.**

- **Ensure there is a balance of measures.**

- **Ensure processes for assuring measure have been met.**

Performance Measures
DON'Ts

- **Don't rely on single factors or overly simple formulas.**

- **Don't provide unnecessary information that may lead to unanswered questions or follow-on inquiries by Congress.**

- **Don't use acronyms, abbreviations not spelled out or terms not previously explained.**

- **Don't submit poorly explained mission-level performance measures – which result in a faulty Post-Implementation Review Plan.**

- **Don't fail to establish performance measures earlier in the process.**

Information Assurance (IA) Strategy DOs

- **Contact your Component IA POC early.**
- **Identify security features, practices, procedures, and architectures of the system that accurately mediate and enforce the DoD Security policy.**
  - **Describe how the security certification/accreditation from the Designated Accreditation Authority (DAA) is in compliance with the Defense Information Technology Security Certification and Accreditation Process (DITSCAP).**
  - **Describe how the system IA strategy is traceable through requirements, design, implementation, and operating procedure documents.**
  - **Describe how the IA strategy is reflected in the System Security Authorization Agreement (SSAA).**
  - **State IA strategy was approved by your Component CIO and give date.**

Information Assurance (IA)
Strategy DON'Ts

- **Don't provide unnecessary information that may lead to unanswered questions or follow-on inquiries by Congress.**
  - **An example would be your specific IA Architecture.**
- **Don't use acronyms, abbreviations not spelled out or terms not previously explained.**

- **No Milestone Approval**

  – **Possible Funding withhold**

  – **Possible Schedule Delay**

- **No Further Contract Award**

NO WAIVERS!

CCA Certification of MAIS Programs In FY05

- **Recent proposed language indicating:**

  - **Possible repeat of congressional requirements**

  - **Notification to Congressional Defense Committees**

- **No Anticipated change in FY04 reporting requirement**

- **Impact on DoD Components**

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BACKUP

CCA Compliance Matrix/ Table

DoDI 5000.2 Table E4.T1.

Requirements Related to the Clinger-Cohen Act (CCA) of 1996 (reference (l))	Applicable Program Documentation **
*** Make a determination that the acquisition supports core, priority functions of the Department	ICD Approval
*** Establish outcome-based performance measures linked to strategic goals	ICD, CDD, CPD and APB approval
*** Redesign the processes that the system supports to reduce costs, improve effectiveness and maximize the use of COTS technology	Approval of the ICD, Concept of Operations, AoA, CDD, and CPD
* No Private Sector or Government source can better support the function	Acquisition Strategy page XX, para XX AoA page XX
* An analysis of alternatives has been conducted	AoA
* An economic analysis has been conducted that includes a calculation of the return on investment; or for non-AIS programs, a Life-Cycle Cost Estimate (LCCE) has been conducted	Program LCCE Program Economic Analysis for MAIS
There are clearly established measures and accountability for program progress	Acquisition Strategy page XX APB
The acquisition is consistent with the Global Information Grid policies and architecture, to include relevant standards	APB (Interoperability KPP) C4ISP (Information Exchange Requirements)
The program has an information assurance strategy that is consistent with DoD policies, standards and architectures, to include relevant standards	Information Assurance Strategy
To the maximum extent practicable, (1) modular contracting has been used, and (2) the program is being implemented in phased, successive increments, each of which meets part of the mission need and delivers measurable benefit, independent of fu	Acquisition Strategy page XX
The system being acquire	

* For weapons systems and command and control systems, these requirements apply to the extent practicable (40 U.S.C. 1451, reference (ay))
** The system documents/information cited are examples of the most likely but not the only references for the required information. If other references are more appropriate, they may be used in addition to or instead of those cited.
***These requirements are presumed to be satisfied for Weapons Systems with embedded IT and for Command and Control Systems that are not themselves IT systems

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CAPITAL PLANNING
40 USC 1413 (b)(2)(A)

Post implementation reviews:
Has fielded system met functional requirements within
cost and schedule?

BPR

Mission Analysis
ICD, CCD, CPD

Performance Gaps

CRP/ ORD requirements

Functional requirements

Performance Measures

Actual Cost, Schedule and Benefits

Information Assurance

AoA

Choosing Capital Asset

Information Assurance

affordability

Selection

Economic Analysis

Cost, Schedule Performance Baseline

Acquisition Program Baseline

Information Assurance

Control

Track and control program
against baseline, to include
performance (ORD

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